

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

EDWINA BILLHIMER, on behalf of herself	:	CIVIL ACTION FILE NO. 3:24-cv-00209-
and others similarly situated,	:	MPB-CSW
Plaintiff,	:	
	:	
v.	:	
	:	
READERSMAGNET, LLC and ELINK	:	
SYSTEMS AND CONCEPTS CORP.	:	
	:	
Defendants.	:	

STIPULATION TO FILE SECOND AMENDED COMPLAINT

As provided for in Federal Rule of Civil Procedure 15(a)(2), the parties hereby stipulate and agree as follows: Defendants consent to the filing of a second amended complaint without conceding the veracity of any of the allegations contained therein or without waiver of any arguments they may make in a responsive pleading.

Respectfully submitted,

For Plaintiff:

/s/ Anthony I. Paronich
Anthony I. Paronich
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
(617) 485-0018
anthony@paronichlaw.com

For Defendants:

/s/ Thomas J. Hayes
Thomas J. Hayes

Dated: December 2, 2025